

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION

IN RE:	§	
	§	
ARABELLA PETROLEUM	§	Case No. 15-70098-RBK-11
COMPANY, LLC,	§	
	§	
Debtor.	§	CHAPTER 11

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MORRIS D. WEISS, CHAPTER 11	§	
TRUSTEE FOR ARABELLA	§	
PETROLEUM COMPANY, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
ARABELLA EXPLORATION INC.,	§	
ARABELLA EXPLORATION LLC,	§	Adversary No. 16-07002-RBK
ARABELLA OPERATING LLC,	§	
TRANS-TEXAS LAND & TITLE, LLC,	§	
PLATINUM PARTNERS CREDIT	§	
OPPORTUNITIES MASTER FUND LP,	§	
PLATINUM LONG TERM GROWTH	§	
VIII, LLC, and JASON HOISAGER,	§	
Individually,	§	
	§	
Defendants.	§	

**DEFENDANT JASON HOISAGER'S RULE 7026 DISCLOSURES**

TO: PLAINTIFF, BY AND THROUGH COUNSEL AS FOLLOWS:

Christopher G. Bradley  
Waller Lansden Dortch & Davis, LLP  
100 Congress Ave., Suite 1800  
Austin, Texas 78701

Eric J. Taube  
Waller Lansden Dortch & Davis, LLP  
100 Congress Ave., Suite 1800  
Austin, Texas 78701

Mark Curtis Taylor  
Waller Lansden Dortch & Davis, LLP  
100 Congress Ave., Suite 1800  
Austin, Texas 78701

Jason Hoisager, individually (“Hoisager” or “Defendant”) in the above styled and numbered adversary proceeding and Defendant herein, submits the following disclosures pursuant to Rule 7026 of the Federal Rules of Bankruptcy Procedure and Rule 26(a)(1) of the Federal Rules of Civil Procedure:

1. Rule 26(a)(1)(A)(i) - Individuals with discoverable information in support of Defendant’s claims:

<b><u>Person</u></b>	<b><u>Subject</u></b>
Jason Hoisager c/o Kevin G. Herd/Joseph F. Postnikoff Goodrich Postnikoff & Associates, LLP 801 Cherry Street, Suite 1010 Fort Worth, Texas 76102	All financial transfers.
Trans-Texas Land & Title, LLC c/o Kevin G. Herd/Joseph F. Postnikoff Goodrich Postnikoff & Associates, LLP 801 Cherry Street, Suite 1010 Fort Worth, Texas 76102	Matters related to Trans-Texas Land & Title, LLC.
Martin D. Weiss, Chapter 11 Trustee for Arabella Petroleum Company, LLC c/o Waller Lansden Dortch & Davis, LLP 100 Congress Ave., Suite 1800 Austin, Texas 78701	Matters related to Arabella Petroleum Company, LLC.
Arabella Exploration, Inc. c/o Katherine T. Hopkins/Clay M. Taylor Kelly Hart & Hallman LLP 201 Main Street, Suite 2500 Fort Worth, Texas 76102	Matters related to Arabella Exploration, Inc.

Arabella Exploration, LLC  
c/o Katherine T. Hopkins/Clay M. Taylor  
Kelly Hart & Hallman LLP  
201 Main Street, Suite 2500  
Fort Worth, Texas 76102

Matters related to Arabella  
Exploration, LLC.

Arabella Operating, LLC  
c/o Katherine T. Hopkins/Clay M. Taylor  
Kelly Hart & Hallman LLP  
201 Main Street, Suite 2500  
Fort Worth, Texas 76102

Matters related to Arabella  
Operating, LLC.

Platinum Partners Credit Opportunities  
Master Fund, LP  
c/o Michael E. Baum/Joseph K. Grekin  
Schafer & Weiner, PLLC  
40950 Woodward Ave., Suite 100  
Bloomfield Hills, Michigan 48304

Matters related to Platinum Partners  
Credit Opportunities, Master Fund,  
LP.

Platinum Long Term Growth VIII, LLC  
c/o VCORP Services, LLC  
c/o Michael E. Baum/Joseph K. Grekin  
Schafer & Weiner, PLLC  
40950 Woodward Ave., Suite 100  
Bloomfield Hills, Michigan 48304

Matters related to Platinum Long  
Term Growth VIII, LLC  
c/o VCORP Services, LLC.

Defendant will supplement this required disclosure as necessary in the course of conduct of discovery in this proceeding.

2. Rule 26(a)(1)(A)(ii) - Description by category and location of documents, etc. in the possession, custody, or control of the Defendant that the Defendant may use to support its claims:

Most of the documents and information relevant to Defendant's claims in this action are in the possession, custody and control of individuals and entities other than Defendant, including but not limited to, Jason Hoisager and Kelley Wohlfahrt.

Subject to attorney-client privilege and the attorney-work product doctrine, all documents, data compilations and tangible things that are in the possession, custody or control of the Defendant that Defendant relies upon in support of his claims against Plaintiff shall be made available for inspection and copying at a time mutually convenient to all parties at the law offices of Goodrich Postnikoff

& Associates, LLP, 801 Cherry Street, Suite 1010, Fort Worth, Texas 76102. In particular, Defendant will make available the following general categories of documents:

<b>Document</b>	<b>Location</b>
Bank Statements	509 Pecan St., Ste. 200 Fort Worth, Texas 76102
Transactional Documents	509 Pecan St., Ste. 200 Fort Worth, Texas 76102

3. Rule 26(a)(1)(A)(iii) - Computation of damages:

Defendant has not calculated damages the subject of this adversary proceeding to date. This disclosure is subject to supplementation as additional information and/or documents come into the possession, custody, or control of the Defendant.

4. Rule 26(a)(1)(A)(iv) – Insurance Agreements:

Executive Advantage Policy issued to Arabella Exploration, Inc. (f/k/a Arabella Exploration, Lone Oak Acquisition Company) by Liberty Insurance Underwriters Inc., as Policy No. DONYAAXNLS002 a renewal of DONYAAXNNLS001.

5. Rule 26(a)(2) – Disclosure of Expert Testimony:

Defendant has not yet designated experts but will supplement this disclosure according to Fed. R. Civ. P. 26(e) should the need arise.

Defendant reserves the right to supplement these Rule 26(a) disclosure responses as discovery progresses in this matter.

DATED this the 20<sup>th</sup> day of July, 2016.

Respectfully submitted:

GOODRICH POSTNIKOFF &  
ASSOCIATES, LLP  
801 Cherry Street, Suite 1010  
Fort Worth, Texas 76102  
Telephone – 817.347.5261  
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By: /s/ Kevin G. Herd  
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COUNSEL FOR DEFENDANT JASON  
HOISAGER, INDIVIDUALLY

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 20<sup>th</sup> day of July, 2016, a copy of the foregoing Defendant's Rule 26(a)(1) Disclosures was served via ECF on the parties registered with the Court to receive ECF.

/s/ Kevin G. Herd  
Kevin G. Herd